

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

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|-------------------------|---|---------------------|
| KIM SMITH, | : | NO.: 1:CV01-0817 |
| | : | |
| Plaintiff | : | (Caldwell, J.) |
| | : | |
| vs. | : | (Mannion, M.J.) |
| | : | |
| WEXFORD HEALTH SOURCES, | : | |
| INC., et al., | : | JURY TRIAL DEMANDED |
| Defendants | : | |

**WEXFORD DEFENDANTS' RESPONSE TO JUDGE CALDWELL'S
ORDER DATED 3/8/04**

Wexford Defendants did not file any additional medical records pertaining to Plaintiff's Hepatitis C condition from 1995 through 2000 with the court due to the fact that Wexford Defendants had previously filed all medical records in their possession with the court on January 21, 2003 attached to the Appendix of Exhibits in Support of Wexford Defendants' Motion for Summary Judgment, specifically Exhibit "D".

By way of further response, any and all other medical records pertaining to Plaintiff's Hepatitis C condition from 1995 through 2000 that are in the possession of Wexford Defendants were previously provided by

Corrections Defendants as those medical records are the property of
Corrections Defendants.

Respectfully submitted,
Lavery, Faherty, Young & Patterson, P.C.

DATE: April 13, 2004

By: S/ Robert G. Hanna, Jr.
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Health Sources, Inc., Ronald Long,
M.D., S. Craig Hoffman and
Melinda Baker, P.A.

CERTIFICATE OF SERVICE

I, Cathleen A. Kohr, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 13th day of April, 2004, I served a true and correct copy of the foregoing **Wexford Defendants' Response to Judge Caldwell's Order dated 3/8/04** , as follows:

Via U.S. First Class mail, postage prepaid:

Kim Smith
CT-2162
SCI-Coal Township
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Via electronic filing:

John Talaber, Esquire
Assistant Counsel
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Office of Chief Counsel
55 Utley Drive
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S/ Cathleen A. Kohr
Cathleen A. Kohr
Paralegal to Robert G. Hanna, Jr., Esq.

This document has also been electronically filed and is available for viewing and downloading from the ECF system.